FEDERAL ON-SCENE COORDINATOR'S REPORT

ELKVIEW SUBMERGED DRUM REMOVAL SITE
ELKVIEW, KANAWHA COUNTY, WEST VIRGINIA

CERCLA EMERGENCY RESPONSE/REMOVAL ACTION
NOVEMBER 6, 1989 through JANUARY 30, 1990

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III, PHILADELPHIA, PENNSYLVANIA

Elkview Submerged Drum Removal Site
Federal On-Scene Coordinator's Report

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REGION III
CERCLA EMERGENCY RESPONSE/REMOVAL ACTION

PROJECT #230
FACT SHEET

SITE:	Elkview Submerged Drum Removal Site
SIZE:	Approximately 50 yards of stream
LOCATION:	Elkview, Kanawha County, West Virginia
APPROVAL DATE:	November 3, 1989
PROJECT DATES:	November 6, 1989 through January 30, 1990
DESCRIPTION:	The site consisted of 7 55-gallon drums that were abandoned and submerged in a tribuary to Little Sandy Creek, a tributary to Elk River, a major source of drinking water for the city of Charleston, WV. Although five of the initially discovered six drums were in good condition, the sixth had an approximate one-inch hole in its side and orange-yellow material on it. EPA was notified of the situation and investigated the situation. At that time, the seventh drum was located approximately 50 yards downstream from the others. The OSC deemed there was a significant risk of harm posed by the abandoned drums and initiated a removal action to mitigate the threat.
HAZARDOUS MATERIAL:	Waste combustible liquid, N.O.S. D001 and combustible liquid, UN1993.
QUANTITIES REMOVED:	8 55-gallon drums; 7 liquid waste, 1 contaminated soil and spent personal protective clothing.
OSC:	Jerry Saseen
REMOVAL CONTRACTOR:	O.H. Materials, Inc., Findlay Ohio
DISPOSAL LOCATION:	Thermal Oxidation Corporation, Roebuck, South Carolina
PROJECT CEILING:	$50,000
PROJECT COST:	$21,653 (Estimated as of 1/30/90)
COMMENTS:	The combined activities of participating agencies enabled the OSC to coordinate an effective response to mitigate the threat to public health and the environment posed by the presence of the abandoned drums at this site.

Jerry Saseen, OSC

Elkview Submerged Drum Removal Site
Federal On-Scene Coordinator's Report

I. INTRODUCTION

A. Initial Situation

West Virginia Department of Natural Resources received a report from a hiker that abandoned drums were seen in a tributary to Sandy Creek, a tributary to Elk River, a source of drinking water for Charleston, WV. OSC Fox was notified of the situation and responded from the Fike/Artel Site.

A preliminary assessment was conducted in conjunction with WVDNR that confirmed the presence of six drums standing upright, but partially submerged, in the tributary. Five of the six drums appeared to be in good condition, but the sixth had a small hole (approximately one inch) halfway up its side with orange-yellow material on it (see Photo #1, Appendix D). In addition, a seventh drum was located lying on its side approximately 50 yards downstream. Per OSC direction, TAT further investigated the situation and obtained readings of 60 and 100 units above background on an HNU from two open bungs. The presence of the drums posed a potential threat to local drinking water prompting the OSC to activate a CERCLA removal action using Delegation of Authority, 14-1-A for $50,000 on November 3, 1989.

B. Site Location

The drums were situated in a tributary to Sandy Creek, a tributary to Elk River in Elkview, Kanawha County, West Virginia, in a wooded area. A location map and site sketch are presented as Appendix A of this report.

C. Efforts to Obtain Cleanup from Potential Responsible Party(ies)

Because the drums were abandoned and there were no identifiable markings on them, the OSC did not conduct an investigation into the identity of any potential responsible parties.

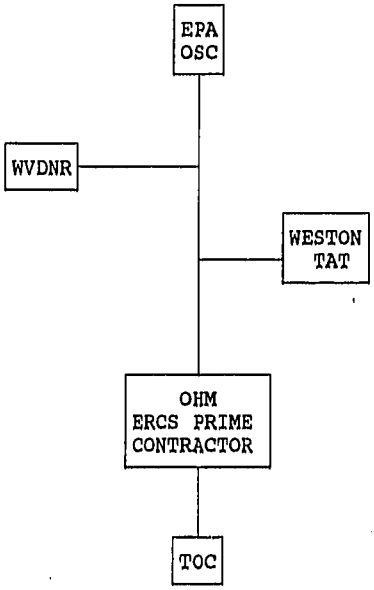
II. ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS

A. Names and Addresses

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
U.S. EPA - Region III Western Removal Section 303 Methodist Building Wheeling, WV 26003 (304) 233-9831	Jerry Saseen	Federal On-Scene Coordinator; coordinated site activities to the conclusion of the project.
U.S. EPA - Region III Western Removal Section 841 Chestnut Building Philadelphia, PA 19107 (215) 597-1389	Douglas P. Fox	Federal On-Scene Coordinator who initially responded to the incident.
West Virginia Department of Natural Resources Hazardous Waste Management Division 1900 Kanawha Boulevard Charleston, WV 25305 (304) 348-2745, 5935	Mark Foley Tom Blake	State contact who coordinated site activities with the OSC. Inspected site biweekly to ensure security of staged drums while awaiting disposal.
Roy F. Weston, Inc. 53 Haddonfield Road, Suite 306 Cherry Hill, NJ 08002 (609) 482-0222	Clay Mullican Christine M. Lipsack	Provided OSC with site support, technical assistance, air monitoring, site safety monitoring, and administrative assitance.
O.H. Materials, Inc. 16406 U.S. Rt. 224 E., P.O. Box 551 Findlay, OH 45839 (419) 423-3526	Robert Collins, Response Manager	ERCS prime removal contractor; responsible for providing manpower and equipment to complete removal
Thermal Oxidation Corporation P.O. Box 306, Railroad Street Roebuck, SC 29376		Disposal facility.

Elkview Submerged Drum Removal Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

B. Organization of the Response



C. Glossary of Abbreviations

CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
EPA	United States Environmental Protection Agency
ERCS	Emergency Response Cleanup Services
NCP	National Oil and Hazardous Substances Contingency Plan
NPL	National Priorities List
OHM	O.H. Materials, Inc., Findlay, Ohio
POLREP	Pollution Report (report of daily site activities)
SARA	Superfund Amendments and Reauthorization Act of 1986
TAT	Roy F. Weston, Inc., Technical Assistance Team
WVDNR	West Virginia Department of Natural Resources

III. CHRONOLOGY OF EVENTS

September 21, 1989

OSC Fox responded from the Fike/Artel Site to a request received at the Regional Response Center of six abandoned drums located in a tributary to Elk River, a source of drinking water for Charleston, WV. OSC Fox instructed TAT to also respond to the scene.

A preliminary assessment was conducted in conjunction with WVDNR that located six drums standing upright, but partially submerged, in a tributary to Little Sandy Creek, which is a tributary to Elk River. Five of the six drums appeared to be in good condition, but the sixth had a small hole (approximately one inch) halfway up its side with orange-yellow material on it (see Photo #1 in Appendix D). Approximately 50 yards downstream, a seventh drum was located lying on its side. Per OSC direction, TAT further investigated the situation and obtained readings of 60 and 100 units above background on an HNU from two open bungs.

November 6, 1989

OSC Saseen mobilized OHM to the site to begin removal operations. Two OHM laborers were taken to the hospital due to shortness of breath caused by low-level carbon monoxide poisoning received in the truck during mobilization activities.

While attempting to gain access to the drums using a backhoe, OHM inadvertently struck a two-inch, gravity-fed crude oil pipeline resulting in a small leak. TAT contacted Quaker State Oil and Eureka Oil to identify the owner of the pipeline. A representative from Eureka Oil came to the site and identified the pipeline as theirs. It was repaired by Eureka without loss of oil and at no cost to the project.

OHM obtained samples from each of the seven drums for disposal analysis.

TAT developed and implemented the site safety plan and provided constant air monitoring during all sampling operations.

November 7, 1989

OHM overpacked the drums and labeled them properly (see Photo #3 in Appendix D). OSC Saseen, TAT and WVDNR made an inspection of the cleanup. Tom Blake of WVDNR would check on drum security on a biweekly basis to ensure security.

November 7, 1989 (continued)
OHM demobilized from the site after being instructed by the OSC to obtain bids for disposal of the drums.

January 30, 1990
Following finalization of disposal arrangements by OHM, Environmental Transportation Services transported the drums to Thermal Oxidation Corporation (TOC) in South Carolina for final disposal (see Photo #4 in Appendix D).

IV. RESOURCES COMMITTED

A. Initial Funding Request

Funding for this removal was obtained through the use of the OSC Delegation of Authority, 14-1-A. On November 3, 1989, OSC Jerry Saseen obtained $50,000 in CERCLA funds to mitigate the threat posed to human health and the environment by the presence of the abandoned drums. Delivery Order #7445-03-057 was issued for $35,000 to O.H. Materials under the ERCS mechanism to perform cleanup activities. A copy of Special Bulletin A is included as Appendix B of this report.

B. Estimated Total Cost Summary (as of 1/30/90)

1. Extramural

ERCS	$11,100
TAT	9,871
Extramural Subtotal	$20,971

2. Intramural

EPA Direct	$ 250
EPA Indirect	432
Intramural Subtotal	$ 682
TOTAL ESTIMATED PROJECT COST	$21,653

PER CENT OF CEILING EXPENDED = 37.96%

V. EFFECTIVENESS OF THE REMOVAL

A. Activities of Various Agencies

1. Potential Responsible Party(ies)

No activities were conducted by any potential responsible parties.

2. Federal Agencies

Jerry Saseen from the EPA Wheeling, West Virginia, office served as the Federal On-Scene Coordinator for this removal action. It is the OSC's responsibility to coordinate personnel and activities to the successful conclusion of the project. OSC Saseen activated CERCLA via Delegation of Authority, 14-1-A, and issued Special Bulletin A to advise EPA Management of the activation.

OSC Douglas Fox of the EPA Philadelphia, Pennsylvania, office was the first EPA official on scene, responding from the Fike/Artel Site in Nitro, West Virginia.

3. State and Local Forces

The West Virginia Department of Natural Resources (WVDNR) received the initial report of the abandoned drums and notified EPA. WVDNR also participated in the initial assessment and performed biweekly inspections of the site to ensure the staged drums remained secure until disposal could be arranged.

4. Contractors

Personnel from the Roy F. Weston Technical Assistance Team (TAT) assisted the OSC during the assessment and during the removal action by providing site safety monitoring, contractor monitoring, and air monitoring.

O.H. Materials, Inc. (OHM), of Findlay, Ohio was selected by the OSC as the prime removal contractor under the Emergency Response Contract Services (ERCS) mechanism. OHM provided the manpower and equipment necessary to complete the removal and arranged for final disposal of the drums.

B. Analytical Synopsis

A sample was collected from each of the seven drums and analyzed for content and compatibility, and for landfill vs. incineration disposal parameters.

Hard copies of analytical reports are maintained in the site file which is kept at the U.S. EPA Philadelphia, Pennsylvania office and photocopies are available upon request to the

B. Analytical Synopsis (continued)
name and address provided in Section II, ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS of this report.

C. Disposal Methods and Quantities Removed
A backhoe was utilized to remove the drums that were partially submerged in the tributary. The seven drums were then staged and bannerguarded on site to await disposal arrangements. An eighth drum contained contaminated soil and spent personal protective clothing.

On January 30, 1990, all eight drums were transported to Thermal Oxidation Corporation in Roebuck, South Carolina for final disposal.

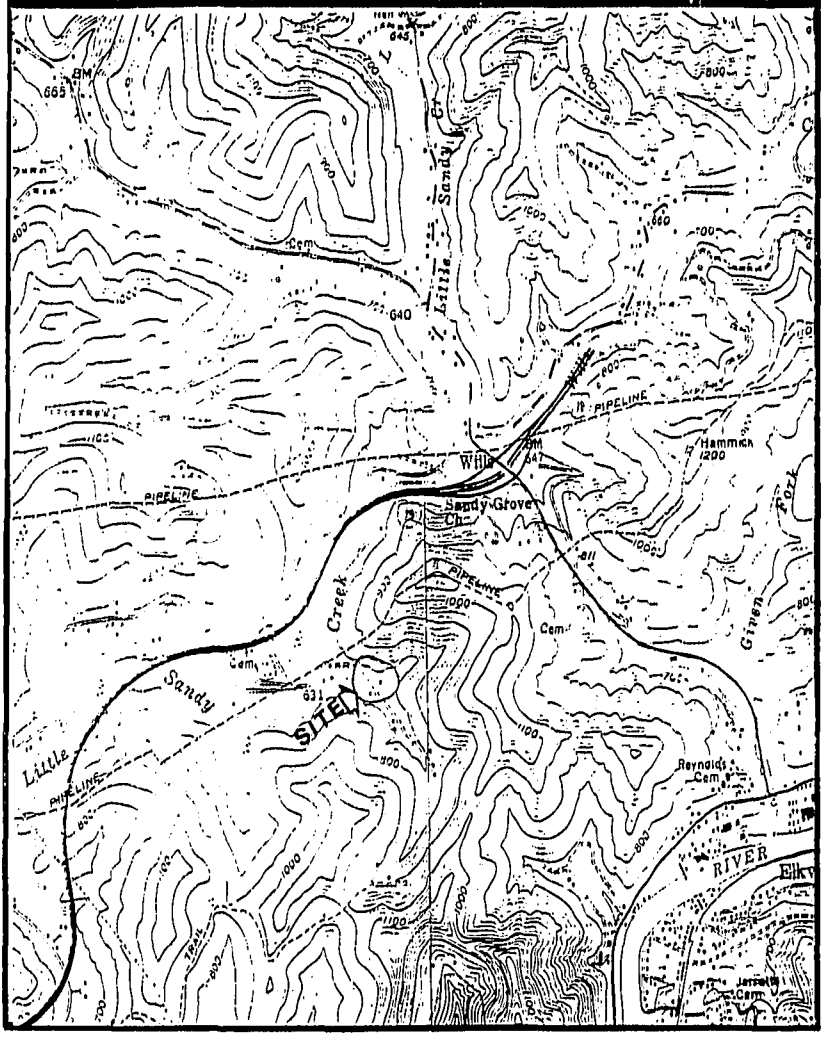
VI. PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

The Elkview Drum Removal action was performed in a timely and efficient manner; however, while attempting to gain access to the drums with a backhoe, OHM personnel inadvertently struck a two-inch, gravity-fed crude oil pipeline, resulting in a small leak in the joint of the pipeline. TAT identified the owner of the pipeline as Eureka Oil, who repaired the leak without a loss of oil.

During the mobilization of OHM, two of their personnel were taken to the hospital due to low-level carbon monoxide poisoning received in the truck. There was no way to predict this minor incident would occur; however, proper actions were taken to remedy the situation.

WESTON · MPD

TDD Number: 8910-70A
PCS Number: 2948



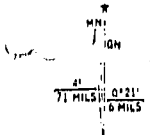
SITE LOCATION MAP

ELKVIEW DRUM CERCLA REMOVAL SITE
ELKVIEW, KANAWHA COUNTY, WEST VIRGINIA

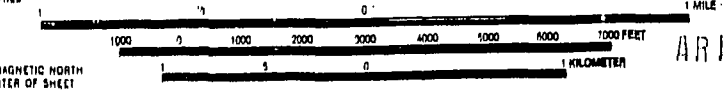
USGS 7.5 MINUTE BIG CHIMNEY, WV

SCALE 1:24,000

QUADRANGLE LOCATION



UTM GRID AND 1976 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET



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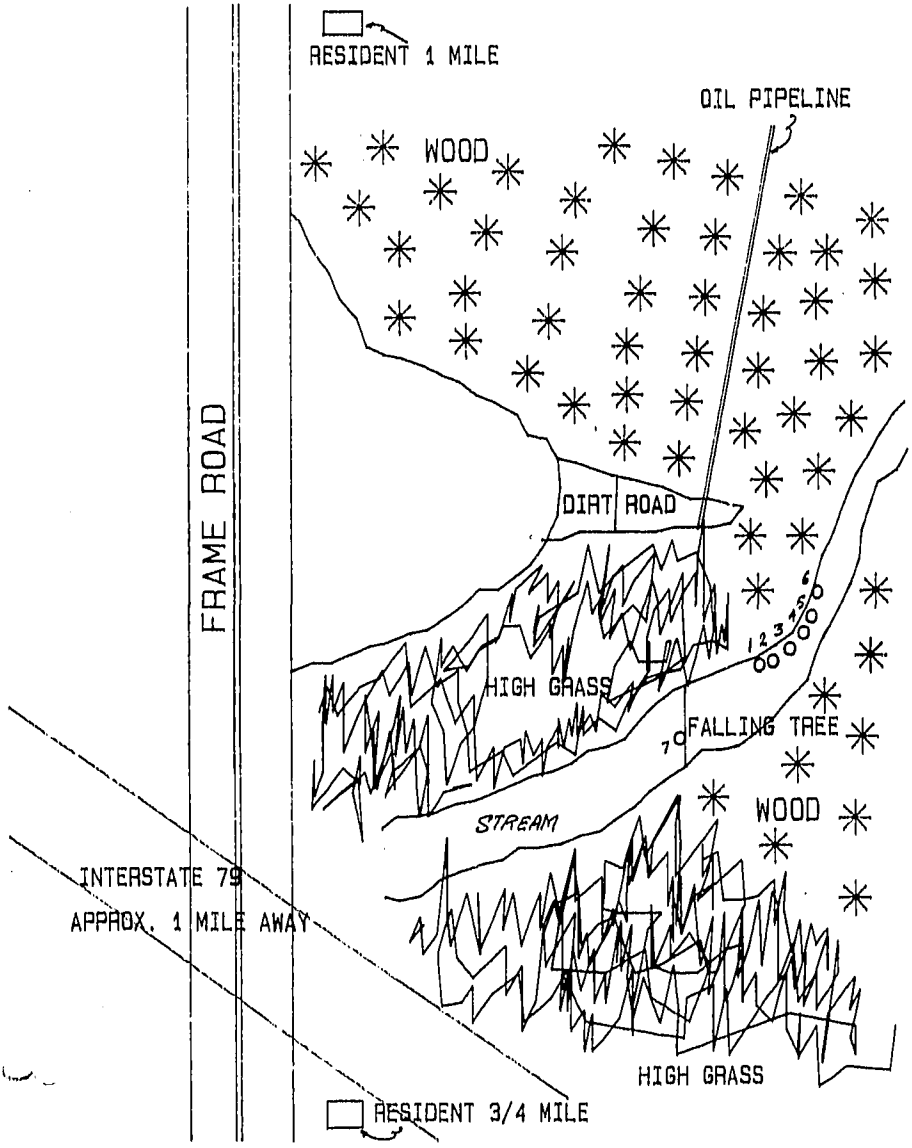
SITE SKETCH

ELKVIEW SITE

KANAWHA COUNTY, WVA



AR100055

To: REGION03.TAT (EPA9322)
To: REG03.TAT/WV (EPA9323)
To: J.SASEEN (EPA9328)
To: C.KLEEMAN (EPA9340)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Fri 3-Nov-89 17:44 EST Sys 163 (133)
Subject: special bulletin a ELKVIEW
Mail Id: IPM-163-891103-159651113

Special Bulletin A
Submerged Drum Site
Little Sandy Tributary
Elkview, Kanawha County, W. Va.

DATE: November 3, 1989

FROM: Jerry Saseen, OSC, EPA Region III
Western Response Section

TO: Regional Response Center, U.S. EPA Region III

THRU: Stephen R. Wassersug, Director
Hazardous Waste Management Division (3HW00)

THRU: Dennis P. Carney, Chief
Superfund Removal Branch (3HW30)

THRU: Charles L. Kleeman, Chief
Western Response Section (3HW32)

I. INTRODUCTION

Notification through the Regional Response Center in accordance with the National Contingency Plan has identified an immediate and significant risk of harm to human health and the environment posed by the presence of drums containing phenols in a tributary to little Sandy Creek.

An inspection performed by the EPA Technical Assistance Team as directed by OSC Jerry Saseen in accordance with the National Contingency Plan has identified an immediate and significant risk of harm to human health and the environment posed by the presence of uncontrolled hazardous materials. Seven drums of an unknown chemical, but all containing phenols, a Cercla hazardous waste, were found illegally dumped by unknown persons, in a tributary to little Sandy Creek, Elkview, Kanawha County, West Virginia. Section 104 of Cercla calls for the initiation of immediate removal where there is a threat of a release of a hazardous substance which may present an imminent and substantial danger to public health or Welfare.

The Delegation of Authority 14-1-A (9/13/87) authorizes the OSC to approve Cercla removals with a total cost of less than $50,000. The OSC, therefore, approved the use of Cercla funds at this site to mitigate the threat to human health and the environment by initiating the immediate removal of the hazardous materials

II. Background

The initial site investigation was performed by the West Virginia Department of Natural Resources, Division of Waste Management on 9/21/89 in response to a report from a person who had been hiking in the area. The West Virginia Department of Natural Resources, confirmed the report and then notified the National Response Center. The National Response Center notified OSC Doug Fox, who was in the area, working at the Fike/Artel Clean-up removal. OSC Fox, then tasked the Technical Assistance Team (TAT) to meet with the W.V. DNR and assess the site.

During the inspection, TAT located a seventh drum located approximately 50 yards down stream. Five of the six drums originally reported were found to be in fair condition, however the sixth, was in poor condition, and had a hole in the lower half of the drum. A very thick, viscous material was observed leaking from this hole. TAT obtained readings of 60 and 100 units on the HNU, from readings taken at the bung openings. TAT, on directives from the OSC obtained samples for the W.V. DNR. The state then had the samples analyzed and it was determined that the material would have to be classified as hazardous waste due to the presence of several types of Phenolic compounds.

III. Threat

The Elkview emergency response meets the following factors in determining the appropriateness of a removal action : 40 CFR 300.65 (b)(2)(i) actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain: (ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems: (iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release: (v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released: (vi) Threat of fire or explosion. In addition, phenol is a known organic acid which can cause skin burns, and ingestion can cause kidney and liver damage.

IV. Scope of Work

The Scope of Work proposed for the implementation of the emergency $50,000 appropriation includes the following: 1) Mobilize Cleanup Crew and equipment, 2) Remove the drums from the unstable stream environment, 3) Overpack the drums, 4) Remove contaminated soil, 5) Sample and perform analytical test in order to arrange for transportation and disposal.

The authorized budget for this removal is:

EPA	7,000
TAT	8,000
ERCS	35,000
TOTAL	$50,000

V. OSC Action

On November 3, 1989 the OSC issued Delivery Order No. 7445-03-057 to ERCS in the amount of $35,000 to initiate removal actions aimed at mitigating the threat to human health and the environment. At this time, no Potential Responsible Parties (PRP's) have been identified. As a result, the OSC has initiated this Cercla removal.

Because the conditions of the "Submerged drum site "meet the conditions of Section 300.65 of the National Contingency Plan for an immediate removal, the OSC has approved this immediate removal action.

Jerry Saseen, OSC
U.S. EPA - Region III
Wheeling, West Virginia

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
SITE SAFETY PLAN

Date: November 3, 1989

Project Name: Elkview Drum CERCLA Removal Site
Elkview, Kanawha County, West Virginia

ERCS Delivery Order #: 7445-03-057

TAT TDD #: 8910-70

U.S. EPA Site I.D.#

Adopted by: Robert Dobbins Date 11-6-89
ERCS Response Manager

Adopted by: Clay Mullican Date 11-6-89
Weston Lead TAT Member

Adopted by: _____ Date _____
U.S. EPA On-Scene Coordinator

Adopted by: _____ Date _____
ERCS Site Safety Officer

Adopted by: Clay Mullican Date 11-6-89
Weston Site Safety Officer

Adopted by: _____ Date _____
U.S. EPA Safety Officer

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Attachments

Glossary of Acronyms

ANSI.....American National Standards Institute
APR.....Air Purifying Respirators
ACGIH.....American Conference of Governmental Industrial Hygienists
CFR.....Code of Federal Regulations
CGI.....Combustable Gas Indicator
Clean Zone...Support Area
CSEP.....Confined Space Entry Permit
Decon.....Decontamination
ERCS.....Emergency Response Clean-up Services
HNU-PID.....HNU Photoionization Detector
Hot Zone.....Exclusion Area
IDLH.....Immediately Dangerous to Life and Health
NIOSH.....National Institute for Occupational Safety and Health
OSC.....On-Scene Coordinator
OSHA.....Occupational Safety and Health Administration
OVA.....Organic Vapor Analyzer
PEL.....Permissible Exposure Limits
PPB.....Parts per Billion
PPM.....Parts per Million
RM.....Response Manager
SCBA.....Self-Contained Breathing Apparatus
SOP.....Standard Operating Procedure
TAT.....Technical Assistance Team
TLV.....Threshold Limit Value
TWA.....Time Weighted Average
US EPA.....United States Environmental Protection Agency

Introduction and Site Entry Requirements

This plan was developed by the EPA Region III with the assistance of the Roy F. Weston, Inc. Technical Assistance Team, and addresses the safety procedures that will be followed by personnel visiting the site or involved in the CERCLA removal activities at the Elkview Drum Site. All personnel entering the site will be required to read and sign this Site Safety Plan. The plan will remain in effect until such time that the OSC certifies that removal activities at the site are completed and that there is no longer a threat of fire and/or explosion or a threat of exposure to unknown chemicals or any other hazardous materials on site. This Site Safety Plan does not supercede any Federal, OSHA, State or local regulations governing worker safety and health protection, but rather is in addition to these other regulations. In the event of a conflict between this plan and another applicable regulation, the more stringent of the two shall apply. The protocol is in accordance with and refers to the terminology used in the Office of Emergency and Remedial Response (OERR), Interim Standard Operating Safety Procedures. The site safety plan is also written in accordance with OSHA's Interim Final Rule for Hazardous Waste Sites and Emergency Response (29 CFR 1910.120) (attached). Should any unforeseen or site peculiar safety related factor, hazard, or condition become evident during the performance of work at this site, 29 CFR 1910 and 29 CFR 1926 shall apply until such time that the On-Scene Coordinator amends this plan to address such items.

Levels of protection will be set inaccordance with the hazard or the particular job location relative to the site. Levels of protection and the site safety plan may be updated in accordance with the site activities to date.

BACKGROUND

The Elkview Drum Site consists of 7- 55 gallon drums of unknown contents. The site is located on the outer boundary of Elkview, Kanawha County, West Virginia. The site is located on Frame Road, a very rural area. the nearest resident lives approximately 1 mile away. Interstate 79 runs parallel to Frame Road and is approximately 1 mile from the site. The drum staging area is visible from Interstate 79.

Upon initial emergency assessment, 6 drums were identified in poor condition located in a seasonal stream to the Little Sandy Creek, a tributary to the Elk River, the source of drinking water to the city of Charleston. During a followup assessment performed by the Technical Assistance Team (TAT) a seventh drum was located laying on its side approximately 50 yards downstream. TAT collected samples from all seven drums, due to a lack of funds TAT turned over samples to the WV DNR for RCRA characteristics, priority pollutants, and oil and grease tests.

GENERAL

1. Site personnel shall be bound by the applicable provisions of this safety plan and shall be responsible for its implementation, including the provisions of safety related equipment, materials, personnel, facilities, maintanence, operations, services, and supervision as provided herein, and for the contractor safety related activities required herein.

2. Subcontractors shall comply with this plan.

3. Employee, public, and environmental safety and health considerations shall take precedence over cost and schedule considerations in the performance of field work at this site.

4. Consistent disregard for the provisions of this safety plan will result in the dismissal from site work.

SECURITY

1. Personal vehicles shall not be used in the performance of work under this delivery order when such involves hazardous work entry or hazardous materials or sample transportation.

2. The Site Control Officer shall be responsible for maintaining a log of security incidents and work area visitors, and for site security during working hours.

3. All visitors to the site shall be briefed on safety and security, and provided with temporary identification and safety equipment prior to entering the site and shall be contractor or OSC/OSR approved and escorted throughout their visit.

4. Visitors shall not be permitted to enter hazardous work areas during work performed by the contractor that presents risks of exposure to hazardous materials.

DAILY SAFETY MEETINGS

Daily safety meetings will be held at the start of each shift to ensure that all personnel understand site conditions and operating procedures, to ensure that personal protective equipment is being used correctly and to address worker health and safety concerns.

SITE SAFETY PLAN ACCEPTANCE ACKNOWLEDGMENT

The OSC or designated representative shall be responsible for informing all individuals entering the exclusion zone or decontamination zone of the contents of this plan and ensuring that each person signs the Safety Plan Acknowledgment Form in Attachment 2. By signing the Safety Plan Acknowledgment Form, individuals are recognizing the hazards present on-site and the polices and procedures required to minimize exposure or adverse effects of these hazards.

TRAINING REQUIREMENTS

1. All site personnel shall certify that they have received the proper safety training prior to their arrival on site (by signing the last sheet of this safety plan) as specified in 29 CFR Part 1910.120.

2. Contractor shall diligently prevent contractor and subcontractor personnel not completing the above required training from entering any hazardous work area associated with this delivery order.

3. Exceptions to the above shall be made only for authorized visitors.

MEDICAL MONITORING REQUIREMENTS

1. All site personnel assigned to site entry functions shall be required to be enrolled in a medical monitoring program as per OSHA Standard 1910.120. Signature on this document shall signify that the individual is enrolled in a medical plan.

2. The site personnel shall be able to produce proof of medical monitoring upon the request of the OSC.

3. In the event of an exposure to site personnel while in a hazardous work area, all work shall cease in that area and appropriate evacuation procedures shall be implemented. The Command Post will be notified of the incident as soon as possible. Exposed personnel, assisted by other members of the entry team as necessary, will exit to the nearest medical facility for appropriate tests and evaluation.

PERSONAL HYGIENE

1. All site personnel shall adhere to the personal hygiene-related provisions of this Safety Plan.

2. Site personnel found to be consistently disregarding the personal hygiene-related rovisions of this plan shall, at the request of the OSC or his/her delegated OSR, be barred from the site. This shall not be constued as relieving the contractor from responsibility for enforcement of Paragraph 1 above of these provisions.

3. The contractor shall provide:
   a. Suitable disosable outerwear, gloves, hard hat liners, and footwear on a daily basis for his employees and visitors.
   b. Contained storage for disposal for disposal of used disposable outerwear.

4. All personnel shall wear appropriate protective clothing, outer footwear, and gloves at all times entering or working in the hazardous work area.

5. Used and visably soiled disposable outerwear shall not be reused, and once removed, shall be placed inside disposable containers provided for this purose.

6. Smoking and tobacco chewing shall be prohibited in any hazardous work area.

7. Eating and drinking shall be prohibited in any hazardous work area.

8. All personnel in a hazardous work area shall be required to leave the area and thoroughly wash their hands before smoking or eating.

9. All personnel working in a hazardous work area shall be required to shower, if necessary, and change to fresh clothing after each working period of a shift.

FIT TESTING REQUIREMENTS

All personnel (including visitors) entering the exclusion zone or decontamination zone using a full-face negative pressure respirator must have successfully passed a qualitative respirator FIT test in accordance with OSHA 29 CFR 1910.134; or, ANSI within the last 12 months. Documentation of FIT testing is the responsibility of each employer. Quantitative FIT testing is required for the use of negative pressure respirators for protection against airborne asbestos fibers (OSHA 29 CFR 1926.58) and lead (OSHA 29 CFR 1910.1025).

1.0 SITE RESPONSIBILITIES AND SCOPE OF WORK

1.1 ROLES AND RESPONSIBILITIES

On-Scene Coordinator (OSC):

The OSC, as the representative of the U.S. EPA, is responsible for overall project administrative and for coordinating health and safety standards for all individuals on-site at all times. All U.S. EPA health and safety guidelines and requirements as well as all applicable OSHA standards shall be applied. However, each contractor (as an employer under OSHA) is also responsible for the health and safety of its employees. If there is any dispute with regards to health and safety, the following procedures shall be followed.

1) Attempt to resolve the issue on-site; and,

2) If the issue cannot be resolved, on-site personnel shall consult off-site supervisors for assistance and the specific task operation in dispute shall be discontinued until the issue is resolved.

Response Manager (RM):

The Response Manager, as the field representative for the ERCS clean-up contractor, has the responsibility for fulfilling the terms of the delivery order. The RM must oversee the project and ensure that all technical, regulatory and safety requirements are met. It is the RM's responsibility to communicate with the OSC as frequently as dictated by the OSC, but at least daily, regarding site clean-up progress and any problems encountered.

Technical Assistance Team (TAT):

The Technical Assistance Team is responsible for providing the OSC with assistance and support in regards to all technical, regulatory and safety aspects of site activity. The TAT is also available to advise the OSC on matters relating to sampling, treatment, packaging, labeling, transport, and disposal of hazardous materials, but is not limited to the above-mentioned.

Other:

Any persons who observe safety problems should immediately report observations/concerns to appropriate key personnel listed on the following page.

1.2 Key Personnel

U.S. EPA On-Scene Coordinator (OSC):	Jerry Saseen, OSC 303 Methodist Building Wheeling, West Virginia 26003
Principle ERCS Contractor:	O.H. Materials Corporation 16406 US Rt. 224 East Findaly, OH 45839
Response Manager (RM):	Robert Collins
Subcontractors:	
Site Health & Safety Officer:	OSC Jerry Saseen
Alt. Health & Safety Officer:	Clay Mullican, TAT, Region III
Technical Assistance Team (TAT):	Roy F. Weston, Inc. 53 Haddonfield Rd. Suite 306 Cherry Hill, NJ 08002 (609) 482-0222
TAT Representatives:	Christine M. Lipsack Clay Mullican

1.3 Scope of Work

To stabilize, control and secure the abandoned, improperly stored drums on site which pose a direct imminent threat to public health and the environment. Initial operations shall consist of gaining access to the stream bed. The second phase will involve overpacking the drums. The third phase will consist of sampling for compatibility analysis. The last phase will be the transportation and disposal of the drums from the site.

2.0 TASK SAFETY AND HEALTH RISK ANALYSIS

This Hazard Assessment identifies the general hazards associated with specific site operations and presents an analysis of documented or potential chemical hazards that exist at the site. Every effort must be made to reduce or eliminate these hazards. Those which cannot be eliminated must be guarded against by use of engineering controls and/or personal protective equipment.

2.1 Activity Specific Hazards and SOPs

2.1.1 Hazards and SOPs Associated with Drum Staging:

Unidentified drums are present on site which represent a safety hazard. Site personnel should not shake, kick, open, handle or sample without level "B" protective clothing. The drums have been altered by heat, weathering, and possible internal chemical reactions. Utilizing the backhoe for drum removal and staging represents a hazard and great caution should be used during these operations.

2.1.2 Hazards and SOPs Associated with Drum Sampling

All drum opening and sampling will be performed in level "B" protective equipment until such a time that the drum contents and their associated hazardous properties have been identified. Drums that can not be opened safely with a bung wrench will not be opened. If this situation arises, safety protocol will be addressed in an amendment.

2.1.3 Hazards and SOPs Associated with Slip, Trip and Fall Hazards

Personnel should be aware they will be navigating in a heavily forested and swampy area. The area also contains numerous oil and natural gas lines. Care should be taken in these areas to avoid mishaps.

2.2 General Site Hazards

Lighting - Work areas must have adequate lighting for employees to see to work and identify hazards (5-foot candles minimum comparable to a single 75-100 watt bulb). Personnel should carry flashlights in all normally dark areas for use in the event of a power failure. Applicable OSHA standards for lighting - 29 CFR 1910.120 (m) - shall apply.

Electrical Power - All electrical power must have a ground fault circuit interrupter as part of the circuit. All equipment must be suitable and approved for the class of hazard. Applicable OSHA standards for electrical - 29 CFR 1926 Subpart "K" shall apply.

Walkways, etc. - Damaged and deteriorated buildings often often contain unguarded walkways, doors, etc. where a fall potential exists. These must be guarded and/or posted to prevent employee use of passage. Applicable OSHA standards for walkways, stairways, etc. - 29 CFR 1926.500 shall apply.

High or Elevated Work - Elevated work where a fall potential exists will be performed using appropriate ladders and/or fall protection (i.e. body harness and lifeline).

Drum Handling - The movement and opening of drums will be done in accordance with 29 CFR 1910.120 (j).

Cold Stress - When the temperature falls below 40°F, cold stress protocol shall be followed. Employees must be supplied with adequate clothing to maintain core temperature. Cold stress is discussed in detail in Attachment .

Heat Stress - When the temperature exceeds 70°F and personnel are wearing protective clothing, a heat stress monitoring program shall be implemented as appropriate. Employees shall have access to break periods and drinking water as necessary. Heat stress is discussed in detail in Attachment .

Eye Wash Protection - All operations involving the potential for eye injury, splash, etc., must have approved eye wash units locally available as per 29 CFR 1910.151 (c).

Fire Protection/Fire Prevention - Operations involving the potential for fire hazards shall be conducted in a manner as to minimize the risk. Non-sparking tools and fire extinguishers shall be used or available as appropriate. Sources of ignition shall be removed. When necessary, explosion-proof instruments and/or bonding and grounding will be used to prevent fire or explosion.

Utilities - Overhead and underground utility hazards shall be identified and or inspected prior to conducting operations involving potential contact.

2.3 Chemical Hazards

Initial emergency assessment revealed moderate levels of organic vapors. However, the entire extent of chemical hazards are unknown at this time. Additional information will be added as it comes k

3.0 TRAINING AND FIT TESTING REQUIREMENTS

Refer to Introduction for Site Entry Requirements.

4.0 PERSONAL PROTECTIVE EQUIPMENT

The following is a brief description of the personal protective equipment which may be required during various phases of the project. The U.S. EPA terminology for protective equipment will be used: Levels A, B, C and D.

Respiratory protective equipment shall be NIOSH-approved and use shall conform to OSHA 29 CFR Part 1910.134 Requirements. Each employer shall maintain a written respirator program detailing selection, use, cleaning, maintenance and storage of respiratory protective equipment.

4.1 Level A Protection Shall Be Used When:

- The extremely hazardous substance requires the highest level of protection for skin, eyes and the respiratory system;
- Substances with a high degree of hazard to the skin are known or suspected;
- Chemical concentrations are known to be above IDLH levels; or,
- Biological hazards requiring Level A are known or suspected.

4.1.1. Level A Protective Equipment at a Minimum Shall Consist of:

- Fully encapsulating exposure suit (selected for resistance to chemical(s) at the site;
- Chemical resistant boot covers worn over safety-toe work boots;
- Chemical resistant outer gloves (disposable);
- Chemical resistant inner gloves (disposable);
- Pressure demand SCBA or airline system with egress bottles;
- Hard-hat; and,
- Use of the "buddy system" for site entry personnel and appropriate back-up support personnel.

4.2 **Level B Protection Shall Be Used When:**

- o The substance(s) has been identified and requires a high level of respiratory protection but less skin protection;
- o Concentrations of chemicals in the air are IDLH or above the maximum use limit of an APR with full-face mask;
- o Oxygen deficient or potentially oxygen deficient atmospheres (<19.5%) are possible; and/or,
- o Confined space entry requires Level B.

4.2.1 Level B Protective Equipment at a Minimum Shall Consist of:

- o Chemical resistant coveralls: Saranex or Tyvek with Acid Splash Suit well secured;
- o Steel-toe workboots;
- o Chemical resistant boots or disposal boot covers:
- o Disposable inner gloves: surgical gloves;
- o Disposable outer gloves: viton or butyl;
- o Supplied air pressure demand SCBA or airline system with 5-minute egress bottle;
- o Hard-hat; and splash guard;
- o Ankles/wrists taped with duct tape.

NOTE: Use of Level B personal protective equipment requires that one (1) person must be available as backup ready to provide emergency assistance. If more than 2 personnel are on the site and line of site is maintained as well as radio contact, the requirement for back up personnel standing by at the decontamination station may not be necessary.

4.3 **Level C Protection Shall Be Used When:**

- The same level of skin protection as Level B, but a lower level of respiratory protection is required;
- The types of air contaminants have been identified, concentrations measured, and an air-purifying respirator is available that can remove contaminants; or,
- The substance has adequate warning properties and all criteria for the use of APR respirators has been met.
- Level 'C' cannot be utilized until the site has been properly characterized and all unknowns identified.

4.3.1 Level C Protective Equipment at a Minimum Shall Consist of:

- Chemical resistant coveralls: Saranex or Tyvek with Acid Splash gear, well secured;
- An OSHA approved 5 minute escape pack;
- Steel-toe workboots;
- Chemical resistant boots or disposal boot covers;
- Disposable inner gloves: surgical gloves;
- Disposable outer gloves; Viton or Butyl;
- Full-face air purifying respirator (APR);
- Appropriate Chemical cartridge or canister:
- Hard-hat;
- Ankles/wrists taped with duct tape.

4.4 Level D Protection Shall Be Used When:

- The atmosphere contains no known hazard; and,
- Work functions preclude splashes, immersion or the potential for unexpected inhalation of, or contact with, hazardous concentrations of harmful chemicals.

4.4.1 Level D Protection Equipment at a Minimum Shall Consist of:

- Standard work uniform or coveralls;
- Safety-toe work boots;
- Gloves as needed;
- Safety glasses as needed;
- Splash shield as needed; and,
- Hard-hat

4.5 Activity Specific Levels of Protection

The required level of protection is specific to the activity being conducted. At this site the minimum levels of protection are as follows:

Activity	Level of Protection	Comments
1. Site Support Command Post	Level D	
2. Contamination Reduction Support	Level D	
3. Site Assessment sampling.	Level B	Due to the nature of chemicals, phenols Level C required
4. Site Assessment and work.	Level C	During drum removal and staging, Level C required.

5.0 AIR MONITORING AND ACTION LEVELS

According to 29 CFR 1910.120 (h) Air Monitoring shall be used to identify and quantify airborne levels of hazardous substances and health hazards in order to determine the appropriate level of employee protection needed on-site.

5.1 Routine Air Monitoring Requirements

- Upon initial entry to rule out IDLH conditions;
- When the possibility of an IDLH condition or flammable atmosphere has developed;
- When work begins on a different portion of the site;
- Contaminants other than those previously identified are being handled;
- A different type of operation is initiated;
- Employees are handling leaking drums or containers or working in areas with obvious liquid contamination; and,
- During confined space work.

Air monitoring will consist at a minimum of the criteria listed below. All air monitoring data will be documented and submitted to the OSC and available in the command post site files for review by all interested persons. Air monitoring instruments will be calibrated and maintained in accordance with the manufacturer's specifications.

6.2 Site Specific Air Monitoring Requirements

Instrument	Compounds To Detect	Frequency	Comments/ Action Level
OVA	Organic vapors and gases.	CONTINUOUS DURING DRUM REMOVAL, STAGING AND SAMPLING OPERATIONS	ABOVE 5 PPM IN WORK AREA

OTHER INSTRUMENTATION IS ON SITE AND WILL BE UTILIZED IF SITUATIONS WARRANTS IT NECCESARY. AS THE PROJECT PROGRESSES, THESE REQUIREMENTS MAY CHANGE.

If OVA readings over 15-20 ppm at 25 to 30 feet downwind from the drum handling or sampling operation, work will be stopped. Cause for high readings will be investigated and upgrading of level of protection will be considered.

6.0 SITE CONTROL AND STANDARD OPERATING PROCEDURES

6.1 Work Zones

The primary purpose for site controls is to establish the hazardous area perimeter, to reduce migration of contaminants into clean areas and to prevent access or exposure to hazardous materials by unauthorized persons. At the end of each workday, the site should be secured or guarded, to prevent unauthorized entry. Site work zones will include:

6.1.1 Clean Zone/Support Zone

This uncontaminated support zone or clean zone will be the area outside the exclusion and decontamination zones and within the geographic perimeters of the site. This area is used for staging of materials, parking of vehicles, office and laboratory facilities, sanitation facilities, and receipt of deliveries. Personnel entering this zone may include delivery personnel, visitors, security guards, etc., who will not necessarily be permitted in the exclusion zone. All personnel arriving in the support zone will upon arrival, report to the command post and sign the site entry/exit log. There will be one controlled entry/exit point from the clean zone to the decontamination zone.

6.1.2 Decontamination Zone

The decontamination zone will provide a location for removal of contaminated personal protective equipment and final decontamination of personnel and equipment. All personnel and equipment should exit via the decon area. A separate decontamination area will be established for heavy equipment.

6.1.3 Exclusion Zone/Hot Zone

The exclusion zone will be the "hot-zone" or contaminated area inside the site perimeter. Entry to and exit from this zone will be made through a designated point and tracked by personnel on a hot zone entry/exit log located at the decon area. Exit from the exclusion zone must be accompanied by personnel and equipment decontamination as described in Section 8.0.

A map of the work zones for this site is attached.

6.2 General Field Safety and Standard Operating Procedures

- It is our policy to practice administrative hazard control for all site areas by restricting entrance to exclusion zones to essential personnel and by using operational SOPs.
- The "buddy system" will be used at all times by all field personnel in the hotzone. No one is to perform field work alone. Maintain visual, voice or radio communication at all times.
- Whenever possible, avoid contact with contaminated (or potentially contaminated) surfaces. Walk around (not through) puddles and discolored surfaces. Do not kneel on the ground or set equipment on the ground. Stay away from any waste drums unless necessary. Protect equipment from contamination by bagging.
- Eating, drinking, or smoking is permitted only in designated areas in the support zone.
- Hands and face must be thoroughly washed upon leaving the decon area.
- Beards or other facial hair that interferes with respirator fit will preclude admission to the hot zone.
- All equipment must be decontaminated or discarded upon exit from the exclusion zone, as determined by the OSC or designate.
- All personnel exiting the exclusion zone must go through the decontamination procedures described in Section 8.0.
- Safety Equipment described in Section 4.0 will be required for all field personnel.

7.0 DECONTAMINATION PROCEDURES

In general, everything that enters the exclusion zone at this site, must either be decontaminated or properly discarded upon exit from the exclusion zone. All personnel, including any state and local officials must enter and exit the hot zone through the decon area. Prior to demobilization, contaminated equipment will be decontaminated and inspected by the OSC or OSC designate before it is moved into the clean zone. Any material that is generated by decontamination procedures will be stored in a designated area in the exclusion zone until disposal arrangements are made.

All personnel must sign the "HOT ZONE ENTRY/EXIT LOG" when entering and exiting the exclusion zone.

NOTE: The type of decontamination solution to be used is dependent on the type of chemical hazards. The decontamination solution for this site is soap and water. Decontamination solution will be changed daily (at a minimum) and collected and stored on-site until disposal arrangements are finalized.

7.1 Procedures for Equipment Decontamination

Following decontamination and prior to exit from the hot zone, the OSC or a designated alternate, shall be responsible for insuring that the item has been sufficiently decontaminated. This inspection shall be included in the site log.

7.2 Procedure for Personnel Decontamination

This decontamination procedure applies to personnel at this site wearing Level B and C protection. These are the minimum acceptable requirements:

Station 1: Equipment Drop

Deposit equipment used on-site (tools, sampling devices and monitoring instruments, radios, etc.) on plastic drop cloths. These items must be decontaminated or discarded as waste prior to removal from the exclusion zone.

Station 2: Outer Boot and Outer Glove Wash and Rinse

Scrub outer boots, outer gloves and/or splash suit with decontamination solution or detergent water. Rinse off using water.

Station 3: Outer Boot and Glove Removal

Remove outer boots and gloves. If outer boots are disposable, deposit in container with plastic liner. If non-disposable, store in a clean dry place.

Station 4: Tank Change

If person leaves exclusion zone to change air tank, this is the last step in the decontamination procedure. Air tank is exchanged, new outer gloves and boot covers donned, joints taped, and person returns to hot zone.

Station 5: Outer Garment Removal

If applicable, remove SCBA back-pack and remain on air as long as possible. Remove Chemical Resistant Outer Garments and deposit in container lined with plastic. Decontaminate or dispose of splash suits as necessary.

Station 6: Respiratory Protection Removal

Remove hard-hat, face-piece, and if applicable, deposit SCBA on a clean surface. APR cartridges will be discarded as appropriate. Wash and rinse respirator at least daily. Wipe off and store respiratory gear in a clean, dry location.

Station 7: Inner Glove Removal

Remove inner gloves. Deposit in container for disposal.

Station 8: Field Wash

Thoroughly wash hands and face with soap and water. Shower as soon as possible.

Emergency Response Contingency Plan
Elkview Drum CERCLA Removal Site

It is essential that site personnel be prepared in the event of an emergency. Emergencies can take many forms; illnesses or injuries, chemical exposures, fires, explosions, spills, leaks, releases in harmful contaminants, or sudden changes in the weather. The following sections outline the general procedures in the Elkview Drum CERCLA Removal Site Contingency Plan.

8.1 **Emergency Contacts for the Elkview Drum Site**

Fire: Big Chimney Fire Dept. 911 (24 hours)

Police: Big Chimney Police Dept. 911 (24 hours)

Ambulance: 911 (24 hours)

Hospital: Charleston Area Medical Center

Poison Control Center: 1-800-642-3625

Directions from Site to hospital:
Charleston General Hospital
Brooks & Washington St.
(304)348-6293

Take I77 south to I64 west to Lee St. exit. Approx. 10 miles. Proceed east on Lee St. Make a left onto Brook St, at the second light you will see hospital on your right.

Note: Maps and directions to Charleston General have been posted in the command post.

The following individual have been trained in CPR and First Aid:

All EPA staff, OSC's,
All Roy F. Weston Inc., Technical Assistance Team Staff
All O. H. Materials' staff

8.2 **Additional Emergency Numbers**

National Response Center	1 800 424 8802 (24 hour)
Center for Disease Control	1 404 488 4100 (24 hour)
Regional Response Center	1 215 597 9898 (24 hour)
AT&F (Explosives Information)	1 800 424 9555
CHEMTREC	1 800 424 9300 (24 hour)
WV DNR	

8.2.1 Roy F. Weston Contacts

Cherry Hill TAT	1 609 482 0222
Wheeling TAT	1 304 233 1610
Weston Medical Emergency Service	1 513 421 3063
Weston 24 Hour Hotline	1 215 524 1925,1926

8.3 Emergency Equipment Available On-Site

Communications Equipment	Location
none	

Medical Equipment	
First Aid Kits	ERCS Response Vehicle command post
Eye Wash Stations	ERCS Response Vehicle
Oxygen	
Safety Shower	ERCS Response Vehicle

Fire Fighting Equipment	
Fire Extinguisher	ERCS Response Vehicle
Inspection Date	

Spill or Leak Equipment	
Absorbent Boom/Pads	ERCS Response Vehicle
Dry Absorbent,Oil Dry	ERCS Response Vehicle

8.4 Project Personnel Responsibilities During Emergencies

On-Scene Coordinator

As the administrator of the project, the OSC has primary responsibility for responding to and correcting emergency situations. The OSC will:

- Take appropriate measures to protect personnel including: withdrawal from the exclusion zone, total evacuation and securing of the site or upgrading and downgrading of levels of protection.

- Take appropriate measures to protect the public and the environment including isolating and securing the site, preventing run-off to surface waters and ending or controlling the emergency to the extent possible.

- Ensure that appropriate Federal, State and local agencies are informed, and emergency response plans are coordinated. In the event of fire or explosion, the Bid Chimney Fire Department will be summoned immediately.In the event of a spill, sanitary districts and drinking water systems may be alerted.

- Ensure that appropriate decon treatment or testing for exposed or injured personnel is obtained.

- Determine the cause of the incident and make recommendations to prevent the reoccurrence;and,

- Ensure that all required reports have been prepared.

Response Manager (R.M.)

The RM must immediately report emergency situations to the OSC, take appropriate measures to protect site personnel, and assist the OSC as necessary in responding to and mitigating the emergency situation.

Technical Assistance Team (TAT)

The TAT must immediately report emergency situations to the OSC, take appropriate measures to protect site personnel and assist the OSC as necessary.

8.5 Medical Emergencies

Any person who becomes ill or injured in the exclusion zone must be decontaminated to the maximum extent possible. If the injury or illness is minor, full decontamination should be completed and first aid administered prior to transport. If the patient's condition is serious, at least partial decontamination should be completed. First aid should be administered by the on-site paramedic during transport to the hospital. All injuries and illnesses must immediately be reported to the OSC.

Any person transporting an injured/exposed person to a clinic or hospital for treatment should take with them directions to the hospital and information on the chemicals they may have been exposed to. This information is available as appended.

Any vehicle used to transport contaminated personnel, will be cleaned or decontaminated as necessary.

8.6 Fire and Explosion

In the event of fire or explosion, the Big Chimney Fire Department will be summoned immediately. Upon their arrival, the OSC or designated alternate will advise the fire commander of the location, nature and identification of the hazardous material in the incident.

If it is safe to do so, site personnel may:
- Use fire fighting equipment available
- Remove or isolate the hazardous materials involved in the incident

8.7 Spill or Leak

In the event of a spill or leak, site personnel will:

- Locate the source of the spillage and stop the flow if it can be done safely; and,
- Begin containment and recovery or the spilled materials.

8.8 Evacuation Routes and Resources

Evacuation routes have been established by work area locations for this site. The primary outside work area has been provided with two designated exit points. Evacuation should be conducted immediately, without regard to equipment under conditions of extreme urgency. See site map for evacuation routes.

- Evacuation notification will be three continuous blast on an air horn, vehicle horn, or verbal communication via radio.

- Keep upwind of smoke, vapors or spill location.

- Exit through the decontamination corridor if possible.

- If evacuation is not via the decontamination corridor, site personnel should remove contaminated clothing once they are in a location of safety and leave it near the exclusion zone or in a safe place.

- The OSC will conduct a head count to insure all personnel have been evacuated safely.

- In the event that emergency site evacuation is necessary, all personnel are to:
    1. Escape the emergency situation.
    2. Decontaminate to the maximum extent practical.
    3. Meet at the U.S. EPA Command Post or the alternate meeting location, depending on specific emergency conditions.

- In the event that the U.S. EPA Command Post is no longer in the safe zone, meet in the commuter parking lot located at the intersection of Frame Road and Interstate 79. (depending on wind direction).

9.0 CONFINED SPACE ENTRY PROCEDURES

A confined space is defined as a space or work area not designed or intended for normal human occupancy, having limited means of access and poor natural ventilation, and or any structure, including buildings or rooms which have limited means of egress. Examples include tanks, vats, and basements. Confined spaces identified at this site are listed below.

Type of Confined Space	Location On-Site	Comments

SITE SAFETY PLAN ACKNOWLEDGMENT FORM

I have been informed and understand and will abide by the procedures set forth in the Safety and Health Plan and Amendments for the Thompson Street Trailer Site.

Printed Name	Signature	Representing	Date
Robert Collins	Robert Collins	OHM	11-6-89
Tim Dillon	Tim Dillon	OHM	11-6-89
Bill Fenwick	Bill Fenwick	OHM	11-6-89
[illegible]	[illegible]	OHM	[illegible]
Chris Lipsack	Chris Lipsack	TAT	11-6-89

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: J.HESTON (EPA9345) Delivered: Mon 25-Sep-89 15:34 EDT
Sys 163 (51)
Subject: Polrep 1 - Elkview Drum Site.
Mail Id: IPM-163-890925-140170074

POLREP #1
Elkview Drum Site Emergency Response
Elkview, Kanawha County, WV
ATTN: Gregg Crystall, Charlie Kleeman and Tim Fields

I. Situation (1230 hours, Thursday 9/21/89)
A. The Regional Response Center received a call concerning six (6) abandoned drums found in a tributary of Elk River in Elkview, Kanawha Co., West Virginia.
B. OSC Fox was notified at 1100 Hrs. at the Fike/Artel Chemical site in Nitro, WV about these drums. OSC Fox contacted Mark Foley of WVDNR to obtain more information.

II. Actions Taken
A. OSC Fox instructed TAT to respond from Fike/Artel Chemical for a preliminary assessment, including photodocumentation and air monitoring.
B. TAT arrived on-scene with WVDNR Foley at 1205 Hrs. Six (6) drums were found in a tributary to Little Sandy Creek, which is a tributary to Elk River. In addition, TAT located a seventh (7) drum laying on its side approximately 50 yards downstream. Elk River is the source of drinking water for Charleston. The intakes are approximately 10 miles downstream from the drums. The drums, of which WVDNR was notified on this date, were reported to have been seen in the creek during September of 1988. The WVDNR rep who initially investigated the situation reported 60 units above background on a Photovac TIP, taken from an open bung on one of the 6 drums. Five of the six drums are in good conditions. The sixth drum has a small (appr. 1 inch) hole about halfway up one side. There is a yellow-orange material on this drum. The six drums are standing upright, and are approximately one-third buried in the stream sediment. The drums are located about 125 yards off a paved road.
C. TAT obtained readings of 60 and 100 units above background on the HNu from two open bungs.

III. Future Plans
A. TAT to collect samples from each of the seven drums. WVDNR will analyze the samples to determine whether they are hazardous.
B. Further actions to be determined after analyses.

Jerry Heston, OSC
U.S. EPA - Region III
Phila., PA.

To: ERD/OERR (EPA5511)
To: J.VINISKI (EPA9314)
To: REGION03.TAT (EPA9322)
To: J.SASEEN (EPA9328)
To: C.KLEEMAN (EPA9340)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Thu 9-Nov-89 20:12 EST
Sys 163 (61)
Subject: ELKVIEW DRUM EMER. RESPONSE aka "SUBMERGED DRUM"
Mail Id: IPM-163-891109-181900378

POLREP # 2
ELKVIEW DRUM EMERGENCY RESPONSE
KANAWHA COUNTY, VIRGINIA.
ATTN. CHARLIE KLEEMAN, GREG CRYSTAL, TIM FIELDS
CC: JERRY SASEEN

I. SITUATION (1730 HOURS, MONDAY, NOVEMBER 6, 1989)

A. OSC SASEEN ON-SITE TO DIRECT TAT, ERCS PERSONNEL. OSC SASEEN DELIGATES RESPONSIBILITIES AND IDENTIFIES PRIORITIES OF EACH CONTRACTOR DURING THIS REMOVAL ACTIVITY.

B. WEATHER: CLEAR AND SUNNY, TEMPERATURES IN THE 70'S

C. PERSONNEL ON SCENE: EPA-1, TAT-2, WV DNR-1, ERCS-4.

D. OSC SASEEN SUBMITS SPECIAL BULLETIN "A" TO THE REGIONAL RESPONSE CENTER 11\03\89.

E. WEST VIRGINIA DEPARTMENT OF NATURAL RESOURCES (WV DNR) ONSITE TO ASSIST IN OPERATIONS.

II. ACTIONS TAKEN

A. OSC SASEEN SELECTS O.H. MATERIALS, AND ISSUES DELIVERY ORDER 7445-03-057. O.H. MATERIALS WAS SELECTED DUE TO THEIR CLOSE PROXIMITY WHICH RESULTED IN A COST SAVINGS TO THE FEDERAL GOVERNMENT.

B. ERCS CONTRACTOR MOBES CREW, STAKE BODY TRUCK, AND BACKHOE TO ELKVIEW SITE. ERCS LABORER TAKEN TO HOSPITAL UPON ARRIVAL ONSITE, DUE TO SHORTNESS OF BREATH AND NUMBNESS IN HIS ARMS. AT 1600 HOURS THE TWO ERCS WORKERS RETURNED TO SITE AND REPORTED THE ILLNESS WAS DUE TO LOW LEVEL CARBON MONOXIDE POISONING RECIEVED IN THE TRUCK DURING MOBE IN OPERATIONS.

C. WHILE ATTEMPTING TO GAIN ACCESS TO THE DRUMS WITH THE BACKHOE, ERCS HIT A TWO INCH GRAVITY FED CRUDE OIL PIPELINE RESULTING IN A SMALL LEAK IN THE JOINT OF THE PIPELINE. TAT CONTACTED QUAKER STATE OIL AND EUREAKA OIL TO IDENTIFY THE PIPELINE. QUAKER STATE REPRESENTATIVE ON SITE FIRST AND IDENTIFIED THE PIPELINE AS BELONGING TO EUREAKA. EUREAKA REPRESENTATIVE VISITED SITE AND VERIFIED OWNERSHIP OF THE PIPELINE. EUREAKA REPAIRED LINE WITHOUT A LOSS OF OIL. OPERATIONS TEMPORARILY CEASED DURING REPAIR OPERATIONS.

D. ERCS OBTAINED SAMPLES OF ALL SEVEN DRUMS. SAMPLES WILL ANALYZED FOR DISPOSAL ACCEPTANCE.

E. TAT DEVELOPED AND IMPLEMENTED SITE SPECIFIC SAFETY PLAN.

F. TAT PROVIDED CONSTANT AIR MONITORING DURING ALL OPERATIONS.

III. FUTURE PLANS

A. ERCS TO OVERPACK DRUMS AND STAGE THEM IN A SECURE LOCATION.

B. ERCS TO ARRANGE FOR ANALYSIS OF SAMPLES AND DISPOSAL OF THE DRUMS.

C. WEST VIRGINIA DNR TO BE IN CONTACT WITH PROPERTY OWNER.

JERRY SASEEN, OSC
U.S. EPA REGION III
WHEELING , WV

To: ERD/OERR (EPA5511)
To: J.VINISKI (EPA9314)
To: REGION03.TAT (EPA9322)
To: J.SASEEN (EPA9328)
To: C.KLEEMAN (EPA9340)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Thu 9-Nov-89 20:16 EST
Sys 163 (60)
Subject: ELKVIEW DRUM EMER. RESPONSE aka "SUBMERGED DRUM"
Mail Id: IPM-163-891109-182420935

POLREP # 3
ELKVIEW DRUM EMERGENCY RESPONSE
KANAWHA COUNTY, VIRGINIA.
ATTN. CHARLIE KLEEMAN, GREG CRYSTAL, TIM FIELDS
CC: JERRY SASEEN

I. SITUATION (1430 HOURS, TUESDAY, NOVEMBER 7, 1989)
A. OSC SASEEN ON SITE TO REVIEW OPERATIONS AND MAKE FINAL INSPECTION OF THE STREAM AND STREAM BANK.
B. WEATHER: CLOUDY AND OVERCAST, TEMPERATURES IN THE 60'S
C. PERSONNEL ON SCENE: EPA-1, TAT-2, WV DNR-1, ERCS-4.
D. WEST VIRGINIA DEPARTMENT OF NATURAL RESOURCES (WV DNR) ONSITE TO ASSIST IN OPERATIONS.

II. ACTIONS TAKEN
A. ERCS MANUALLY OVERPACKED DRUMS DUE TO REMOTE LOCATION.
B. AFTER SECURING DRUMS IN OVERPACKS ERCS USED THE BACKHOE AND A SLING TO PULL THE DRUMS UP THE STREAM BANK TO A SECURE LOCATION. ERCS CLEANED THE OVERPACKS AND PREPARED THEM FOR SHIPPMENT ACCORDING TO DOT REGULATIONS.
C. OSC REQUESTED ERCS TO STAGE DRUMS OUT OF SITE, IN AN ATTEMPT TO AVOID VANDALISM. DRUMS WERE POSTED WITH "CAUTION" AND "HAZARDOUS MATERIALS" TAPE. DRUMS WERE LABELLED U.S. EPA AND THE PHONE NUMBER OF THE WV. DNR WAS ALSO PLACED ON THE DRUMS SHOULD ANYONE HAVE ANY QUESTIONS.
D. TAT PROVIDED CONTRACTOR MONITORING AND CONSTANT AIR MONITORING DURING ALL SITE OPERATIONS.
E. OSC SASEEN, TAT AND WV. DNR MADE FINAL INSPECTION OF SITE CLEANUP. OSC AND WVDNR VERY PLEASED WITH CLEANUP ACTIVITIES.
F. ERCS DEMOBED SITE AT 1330 HOURS.

III. FUTURE PLANS
A. ERCS TO OBTAIN THREE BIDS AND ARRANGE FOR ANALYSIS OF SAMPLES AND DISPOSAL OF THE DRUMMED MATERIAL.
B. WV. DNR REPRESENTATIVE, TOM BLAKE TO CHECK ON SECURITY OF DRUMS ON A BIWEEKLY BASIS UNTIL DISPOSAL ARRANGEMENTS ARE FINALIZED.
C. WV.DNR TO BE IN CONTACT WITH PROPERTY OWNER.
D. OSC, TAT TO RETURN TO SITE WHEN DISPOSAL ARRANGEMENTS HAVE BEEN FINALIZED.

JERRY SASEEN, OSC
U.S. EPA REGION III
WHEELING , WV

To: ERD/OERR (EPA5511)
To: J.VINISKI (EPA9314)
To: REGION03.TAT (EPA9322)
To: REG03.TAT/WV (EPA9323)
To: J.SASEEN (EPA9328)
To: C.KLEEMAN (EPA9340)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Wed 7-Feb-90 7:05 EST
Sys 163 (42)
Subject: POLREP 4 AND FINAL ELKVIEW
Mail Id: IPM-163-900207-063830323

POLREP #4 AND FINAL
ELKVIEW DRUM EMERGENCY RESPONSE
ELKVIEW, KANAWHA COUNTY, WV
ATTN: GREGG CRYSTALL, CHARLIE KLEEMAN AND TIM FIELDS

I. SITUATION (1600 HOURS, TUESDAY 1/30/90)
A. ALL SITE ACTIVITY INCLUDING DISPOSAL OPERATIONS WERE COMPLETED TUESDAY JANUARY 30, 1990.
B. WEATHER: SUNNY WITH TEMPERATURES IN THE 60'S.
C. PERSONNEL ON SITE: EPA-0, TAT-1, WV DNR-1, WASTE-TRON-2.
D. ESTIMATED COST TO DATE: (1/31/90)

EPA (DIRECT)	$ 250
(INDIRECT)	432
TAT	7,200
ERCS	11,100
ESTIMATED TOTAL	$ 18,982

II. ACTIONS TAKEN
A. WASTE-TRON ARRANGED FOR A BACK-HOE TO BE ON SITE IN ORDER TO LOAD THE DRUMS.
B. TAT ON-SCENE TO MONITOR DISPOSAL OPERATIONS. DISPOSAL OF ALL EIGHT (8) DRUMS OF HAZARDOUS MATERIALS WAS COMPLETED. ALL DRUMS WERE PROPERLY MANIFESTED AND SHIPPED TO TOC IN SOUTH CAROLINA BY THE TRANSPORTER, ENVIRONMENTAL TRANSPORTATION SERVICES.

III. FUTURE PLANS
A. AT THIS TIME, THE OSC DOES NOT ANTICIPATE ANY FURTHER EPA ACTIONS.
B. OSC REPORT TO BE PREPARED FOR THIS PROJECT WITHIN SIXTY DAYS AS PER THE NCP REQUIREMENTS.

JERRY SASEEN, SR. OSC
US EPA, REGION III
WHEELING, WEST VIRGINIA

OHM Corporation

RECEIVED

DEC 4 1989

REGION III
EMERGENCY RESPONSE SECTION

November 27, 1989

Mr. Jerry Saseen
USEPA REGION III
303 Methodist Building
Wheeling, WV 26003

RE: CONTRACT 68-01-7445, ERCS ZONE I, ACKNOWLEDGEMENT LETTER

Dear Mr. Saseen:

This letter is to confirm that O.H. Materials, Corp. has received Delivery Order Number 7445-03-057 for the Elkview Drum Site in Elkview, Kanawha County, West Virginia and has started work as per your request.

Sincerely,

John E. Copus/ddc

John E. Copus
Deputy Program Manager
ERCS Zone I

JEC:ddc

pc: Mr. Bob VanFossen, DPO
Project File 8112E

AR100092

(Shaded areas are for use of procurement office only)

Page of

US Environmental Protection Agency
Washington, DC 20460

EPA Procurement Request/Order

1. Name of Originator	2. Date of Requisition
[illegible]	November [illegible], 19[illegible]

3. Mail Code	4. Telephone Number	5. Date Item Required
[illegible]	[illegible]	[illegible]

Signature of Originator

7. Recommended Procurement Method
☐ Competitive ☐ Other than full and open competition ☐ Sole source small purchase

8. Deliver To (Project Manager)	9. Address	10. Mail Code	11. Telephone Number
[illegible]	[illegible] St., Phila., PA [illegible]	[illegible]	[illegible]

12. Financial Data	a. Appropriation	b. Servicing Finance Office Number	NOTE: Item 12(d) Document Type — Contract = "C," Purchase Order = "P"
	[illegible]	[illegible]	

FMO Use (c) (13 digits)	DT (d)	Document Control Number (e) (6 digits)	Account Number (f) (10 digits)	Object Class (g) (4 digits)	Amount (h) Dollars	Cents
		[illegible]	[illegible]	[illegible]	[illegible]	00

13. Suggested Source (Name, Address, ZIP Code, Phone/Contact)
[illegible] Materials
[illegible], [illegible]

14. Amount of money committed is:
☒ Original
☐ Increase
☐ Decrease

15. For Small Purchases Only: Contracting Office is authorized to exceed the amount shown in Block 12(h) by 10% or $100, whichever is less.
☐ Yes ☐ No

16. Approvals

a. Branch/Office	Date	d. Property Management Officer/Designee	Date
[illegible] P. [illegible]			
b. Division/Office	Date	e. Other (Specify)	Date
[illegible] C. Voltaggio			
c. Funds listed in Block 12 and Block 15 (if any) are available and reserved. (Signature of Certifying Official)	Date	f. Other (Specify)	Date
[illegible] Earle			

17. Date of Order	18. Order Number	19. Contract Number (if any)	20. Discount Terms

21. FOB Point	22. Delivery to FOB Point by On or before (Date)	23. Person Taking Order/Quote and Phone No.

24. Contractor (Name, address, ZIP Code)

25. Type of Order
☐ a. Purchase
Reference your quote (See block 23)
Please furnish the above on the terms specified on both sides of this order and on the attached sheets, if any, including delivery as indicated.
☐ b. Delivery provisions on the reverse are deleted. The delivery order is subject to the terms and conditions of the contract. (See Block 19)
c. ☐ Oral ☐ Written ☐ Confirming

26. Schedule

Item Number (a)	Supplies or Services (b)	Quantity Ordered (c)	Unit (d)	Estimated Unit Price (e)	Unit Price (f)	Amount (g)	Quantity Accepted (h)
	SITE NAME: Elkview Drum Site						
	SITE ID#: [illegible]						
	LOCATION: Kanawha County, Elkview, WV						
	CONTRACT #: 68-01-7445						
	DELIVERY ORDER NO: 7445-03-057						
					Total $		

27. United States of America
By (Signature)

28. Typed Name and Title of Contracting Officer

AR100093

EPA Form 1900-8 (Rev. 9-86) Previous editions are obsolete.

South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt
2600 Bull Street, Columbia, SC 29201
Phone: (803) 734-5200
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE (Form designed for use on elite (12-pitch) typewriter) Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No. W V P 0 0 0 0 0 1 0 2 8 1 2 9 9 0 — Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is by State law.

GENERATOR

3. Generator's Name and Mailing Address
US EPA Region III/Elkview Superfund Site
303 Methodist Building, Wheeling, WV. 26003

4. Generator's Phone (304) 233-9831

A. State Manifest Document Number

B. State Generator's ID Same

5. Transporter 1 Company Name: Environmental Transport Ser.
6. U.S. EPA ID Number: O K D 9 8 1 6 0 5 3 6 3

C. State Transporter's ID

D. Transporter's Phone 405-745-2002

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
THERMAL OXIDATION CORPORATION
P. O. BOX 306, RAILROAD STREET
ROEBUCK, SC 29376

10. U.S. EPA ID Number: S C D 9 8 1 4 6 7 6 1 6

G. State Facility's ID

H. Facility's Phone 1-800-876-1085

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. "RQ-100" Waste Combustible Liquid, n.o.s. (EPA D001) Combustible Liquid, UN 1993	X X 1	D M	X X 1 2 3 5	G	D001
b.					
c.					
d.					

ATTENTION
PLEASE FORWARD TO
ENVIRONMENTAL
COMPLIANCE DEPT.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a. T O - 0 7 6 0 9 - 2 7 6 4

b. - -

d. - -

15. Special Handing Instructions and Additional Information

a. #08770

WO# 8700

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 12 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate including suggestions for reducing this burden to Chief Information Policy Branch, PM-223 U.S. Environmental Protection Agency 401 M St, S.W. Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget Washington D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford

Printed/Typed Name	Signature	Month	Day	Year
Gerald T. Heston	Gerald T. Heston for U.S. EPA	10	12	90

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
MIKE FRASHER	Mike Frasher	10	13	90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

a. 3491 lbs c. lbs

b. lbs d. lbs

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19

Printed/Typed Name	Signature	Month	Day	Year
CHARLES HARMAN	Charles Harman	10	31	90

EPA Form 8700-22 (Rev. 3-88) Previous Editions are Obsolete (DHEC 1988 (Rev. 5/89))

Response

REGION III INCIDENT NOTIFICATION REPORT

1. Case No.: IN 89 468

2. Reported: (mm/dd/yy) 9-21-89 | 3. Time: 1030 | Recorded By: J. Matsinger

4. ☐ Through NRC: | 5. NRC Case No.: none

A. REPORTER

6. Reported By: Mark Foley

7. Organization Name: WVDNR

8. Organization: ☐ 9. discharger ☐ 10. public ☒ 11. state ☐ 12. local ☐ 13. federal

14. Address:

15. City: | 16. County: | 17. State: WV

18. Zip: | 19. Phone: (304) 348-2745

B. DISCHARGER

20. ☐ As Above in A if 9 applies | 21. Name: Unknown

22. Address:

23. City: | 24. County: | 25. State

26. Zip: | 27. Phone: ( )

C. INCIDENT LOCATION

28. ☐ As Above in B | 29. Street or Approx. Location: Wilbs Creek Road, off I79

30. City: Elkview | 31. County: Kanawha | 32. State: WV

D. DATE

33. Spill Date: (mm/dd/yy) 9-20-89 | 34. Spill Time:

E. MATERIAL

Material: ☐ oil ☐ other hazardous substance ☒ 35. Material Unknown	UN/DOT No	CAS No.	CHRIS Code	Quantity Spilled	Units (Circle 1)
6 55-gallon drums	38	39	40 unk		41 lbs gal cuft cuin
42	43	44	45	46	47 lbs gal cuft cuin
48	49	50	51	52	53 lbs gal cuft cuin

F. SOURCE

Source of Spill: ☐ 54. highway ☐ 55. air transport ☐ 56. railway ☐ 57. vessel ☐ 58. fixed facility ☐ 59. pipeline ☐ 60. offshore U.S.T. ☒ Unknown | 61. Vehicle ID or Carrier No.:

62. Description: Unknown Source Abandoned drums

G. MED.

Medium Affected: ☐ 63. air ☐ 64. land ☒ 65. water drinking water ☐ 66. groundwater ☐ 67. within facility only none

68. Waterway Affected: Unnamed trib to Wilbs Creek

H. CAUSE

Reported Cause: ☐ 69. transportation accident ☐ 70. equipment failure ☐ 71. operational error ☐ 72. natural phenomenon ☒ 73. dumping ☐ 74. unknown ☐ 75. other

76. Description:

I. DAMAGES

Damages: 77. no. of injuries ____ 78. no. of deaths ____ ☐ 79. property damage > $50,000

J. ACTIONS

80. ☐ Evacuation | 81. Response Action Taken: WVDNR responded, but are not equipped to handle/remove drums. Request EPA resp.

K. NOTIFIED

Coast Has Notified: ☐ 82. state/local ☐ 83. discharger ☐ 84. USCG ☐ 85. other ☐ 86. unknown

Agency Name:

L. COMMENTS

87. Comments: WVDNR was told about drums yesterday by campers (who originally reported drums 1 year ago) ☒ Additional Information

REGIONAL DATA FIELDS

Responsibility: ☒ EPA ☐ USCG | ☐ Non-duty hours | ☐ CWA 308 Spill/Int

Response by: ☐ responsible party ☐ State ☐ local ☒ OSC/EPA ☐ other ☐ USCG

Agency Name: EPA/TAT

If OSC: Name: ☐ 311 Activation -- PIC # ☒ CERCLA Activation

EPA NOTIFICATION: Name, date, & time; | USCG: | WFO: | State/local: | EPA: | OSC notified: D. Fay | Referral:

ART00055